

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

FILED

MAGISTRATE JUDGE COX

v.

JUL 31 2008

CRIMINAL COMPLAINT

GREG INGERSOLL,
JEFFREY INGERSOLL, and
RUSSELL KOZBIEŁ

MAGISTRATE JUDGE SUSAN E. COX
UNITED STATES DISTRICT COURT

08CR 612
CASE NUMBER:

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 28, 2008 in Cook county, in the Northern District of Illinois defendants,

stole, purloined, and knowingly converted to their own use and the use of another, property made and being made under contract for an agency of the United States, namely, a water cooler supplied under contract to the United States Courthouse, which property was valued at less than \$1,000,

in violation of Title 18 United States Code, Sections 641.

I further state that I am a(n) Law Enforcement Security Officer, United States Department of Homeland Security, Immigration Customs Enforcement, Federal Protective Service Division and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof: X Yes No


Signature of Complainant

Sworn to before me and subscribed in my presence,

July 31, 2008
Date

at 4:53pm

Chicago, Illinois
City and State

SUSAN E. COX, U.S. Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
)
COUNTY OF COOK)

AFFIDAVIT

I, Leonard Wilkerson, being duly sworn, state as follows:

1. I am a Law Enforcement Security Officer with the United States Department of Homeland Security, Federal Protective Service (“FPS”), and have been so employed for the past twelve years. During my employment I have personally investigated or been involved in investigating over one hundred cases involving vandalism, larceny, assault and other crimes. I am assigned to the Region 5 Chicago Field Office, FPS District One. My duties include the enforcement of Title 41, Code of Federal Regulations, detect and deter criminal activity on government property, detain subjects and make arrests, serve warrants, respond to emergencies and calls for assistance, provide oversight on federal contracts and contractors, conduct physical security surveys and recommend security countermeasures for implementation in federal facilities.

2. This Affidavit is in support of a complaint charging GREG INGERSOLL, JEFFREY INGERSOLL, and RUSSELL KOZBIEL with a misdemeanor violation of Title 18, United States Code, Section 641. The information in this Affidavit is based on my own investigation as well as on information I have received from other sources. This affidavit does not contain all the details of the information known to me regarding the events described herein.

INVESTIGATION

3. On or about Wednesday, July 30, 2008, an employee of the procurement office reported that a water cooler located on the fifteenth floor of the Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois, was missing. As a result, your affiant initiated an investigation and obtained surveillance film from the United States Marshal’s Service. During review of that footage, your

affiant observed three males using the freight elevator in the Dirksen Federal Building to transport a water cooler and two water bottles off of the 15th floor of the Dirksen Federal Building.

4. After further investigation, your affiant learned that the General Services Administration (“GSA”) had temporarily assigned two rooms located on the 29th floor of the Dirksen Federal Building to Company A. Company A is a construction service provider that is currently performing contract services for the GSA. The GSA is an agency of the United States.

5. During a search of the rooms currently occupied by Company A, your affiant discovered an Ice Mountain water cooler and two water jugs.

6. On or about July 31, 2008, officers with FPS interviewed the defendants. Defendants GREGORY INGERSOLL and JEFFREY INGERSOLL admitted to taking the water cooler and water jugs to the 29th floor space.

7. The Ice Mountain water cooler is currently leased to the United States Courthouse, Northern District of Illinois. The water cooler and water jugs are currently valued at approximately \$150.

CONCLUSION

8. Based on the foregoing, probable cause exists that GREG INGERSOLL, JEFFREY INGERSOLL, and RUSSELL KOZBIEL, stole, purloined, and knowingly converted to their own use and the use of another, property made and being made under contract for an agency of the United States, namely, a water cooler supplied under contract to the United States Courthouse, which property was valued at less than \$1,000, in violation of Title 18, United States Code, Section 641. FURTHER AFFIANT SAYETH NOT.


Leonard Wilkerson, Law Enforcement
Security Officer
United States Department of Homeland Security,
Immigration Customs Enforcement, Federal
Protective Services Division

SUBSCRIBED AND SWORN TO BEFORE ME
this 31st day of July, 2008.


UNITED STATES MAGISTRATE JUDGE